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Counsel for DRRT Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**MOTION SEEKING RELIEF FROM
ORDERS DISALLOWING AND
EXPUNGING PROOFS OF CLAIM
PURSUANT TO REORGANIZED
DEBTORS' ELEVENTH AND
THIRTEENTH SECURITIES CLAIMS
OMNIBUS OBJECTIONS (CLAIMS
BARRED BY THE STATUTE OF
REPOSE)**

Re: Dkt. Nos. 11014, 11085, 11216, 11315

1 Individual Claimants DRRT FBO BAYERNINVEST KAPITALVERWALTUNGSGESELLSCHAFT
2 MBH, DRRT FBO CREDIT SUISSE FUNDS AG, DRRT FBO DEKA INVESTMENT GMBH, DRRT
3 FBO GIAM GENERALI INSURANCE ASSET MANAGEMENT, DRRT FBO HELABA INVEST
4 KAPITALANLAGEGESELLSCHAFT MBH, DRRT FBO INTERNATIONALE
5 KAPITALANLAGEGESELLSCHAFT MBH, DRRT FBO KAISER PERMANENTE, DRRT FBO
6 METZLER ASSET MANAGEMENT GMBH, DRRT FBO SWISS REINSURANCE COMPANY LTD,
7 DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG, DRRT FBO UBS FUND
8 MANAGEMENT LUXEMBOURG S.A. and DRRT FBO MEAG MUNICH ERGO
9 KAPITALANLAGEGESELLSCHAFT MBH (“**DRRT Claimants**”)¹ hereby respectfully submit this
10 Motion Seeking Relief from Orders Disallowing and Expunging Proofs of Claim Pursuant to Reorganized
11 Debtors’ Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred by the Statute
12 of Repose) [Dkt Nos. 11014, 11085, 11216, 11315].

13 As grounds for this motion, the DRRT Claimants state that they did not receive effective notice of
14 the Eleventh and Thirteenth Securities Claims Omnibus Objections and were unable to lodge their
15 oppositions until October 27, 2021 [Dkt. No. 11498].

16 DRRT is the appointed claims filing representative for the DRRT Claimants. The notices of the
17 Eleventh and Thirteenth Securities Claims Omnibus Objections (the “Objections”) that were sent only by
18 standard USPS mail by the Claims Administrator, Prime Clerk, were not received by DRRT until after the
19 relevant deadline to file a response to the Objections had passed. Thus, pursuant to Fed. R. Civ. P. 60(b)(1),
20 the DRRT Claimants request that the court relieve them from the Orders Disallowing and Expunging
21 Proofs of Claim Pursuant to Reorganized Debtors’ Eleventh and Thirteenth Securities Claims Omnibus
22 Objections on the grounds of mistake, inadvertence, and excusable neglect.
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28 ¹ In conformance with the ADR Procedures adopted by this Court, the DRRT Claimants
provide Appendix A, listing information relevant to their claims, including claim numbers.

1 Since other claimants lodged objections after the purported August 31, 2021 and September 15,
2 2021 deadlines to do so for the Eleventh and Thirteen Securities Claims Omnibus Objections, and were
3 subsequently withdrawn from those objections and thus not subject to the expungement orders that
4 followed, there will be no prejudice to the parties or disruption of the Court's schedule by allowing the
5 DRRT Claimants to be excluded from the Orders Disallowing and Expunging Proofs of Claim Pursuant
6 to Reorganized Debtors' Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred
7 by the Statute of Repose) [Dkt. Nos. 11216, 11315], in similar fashion to those claimants whose objections
8 were withdrawn after post-deadline oppositions were filed, thus relief is also justified for this reason
9 pursuant to Fed. R. Civ. P. 60(b)(6).
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11 Furthermore, the DRRT Claimants' opposition and arguments to the Eleventh and Thirteenth
12 Securities Claims Omnibus Objections are laid out in their Motion for Leave to File Late and Opposition
13 to Reorganized Debtors' Eleventh, Thirteenth, and Fourteenth Securities Claims Omnibus Objections
14 (Claims Barred by the Statute of Repose) [Dkt. No. 11498] via joinder in support of the PGIM FI
15 Claimants' Response and Opposition to Reorganized Debtors' Eleventh Securities Claims Omnibus
16 Objection (the "**PGIM Response and Opposition**") [Docket No. 11168] and Oregon's Opposition to
17 Reorganized Debtors' Eleventh Securities Claims Omnibus Objection (Claims Barred By the Statute of
18 Repose) (the "**Oregon Opposition**") [Docket No. 11170] as their opposition to the Eleventh and
19 Thirteenth Objections, with the arguments against granting the Eleventh Omnibus Objection applying
20 with equal force and weight in favor of denying the Thirteenth Objection as well.
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24 **RESERVATION OF RIGHTS**

25 The DRRT Claimants reserve all of their respective rights, claims, defenses, and remedies,
26 including, without limitation, the right to amend, modify, or supplement this request in accordance with
27 applicable rules.
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2 Dated: 11/16/2021

DRRT

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4 By: 

JARED LAY

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6 Attorney for the DRRT Claimants
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APPENDIX A

Creditor	Claim No.	Filing Date	Amount of Claim	Notice Address
DRRT FBO BAYERNINVEST KAPITALVERWALTUNGSGESELL SCHAFT MBH	98950	4/10/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO CREDIT SUISSE FUNDS AG	101102	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO CREDIT SUISSE FUNDS AG	101205	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO DEKA INVESTMENT GMBH	101465	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO GIAM GENERALI INSURANCE ASSET MANAGEMENT	100042	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO HELABA INVEST KAPITALANLAGEGESELLSCHAFT MBH	99550	4/14/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000

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Creditor	Claim No.	Filing Date	Amount of Claim	Notice Address
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELLSCHAFT MBH	99604	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELLSCHAFT MBH	99607	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELLSCHAFT MBH	100137	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO KAISER PERMANENTE	98964	4/9/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO KAISER PERMANENTE	98968	4/9/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO KAISER PERMANENTE	98995	4/10/2020	\$ 641,250.00	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000

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Creditor	Claim No.	Filing Date	Amount of Claim	Notice Address
DRRT FBO KAISER PERMANENTE	99006	4/10/2020	\$ 235,337.50	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO KAISER PERMANENTE	99002	4/10/2020	\$ 322,437.50	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO METZLER ASSET MANAGEMENT GMBH	100338	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO SWISS REINSURANCE COMPANY LTD	99707	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO SWISS REINSURANCE COMPANY LTD	99816	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO SWISS REINSURANCE COMPANY LTD	99829	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000

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Creditor	Claim No.	Filing Date	Amount of Claim	Notice Address
DRRT FBO SWISS REINSURANCE COMPANY LTD	99841	4/15/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100514	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100541	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100585	4/16/2020	\$ 593,525.00	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100543	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100560	4/16/2020	\$ 308,875.00	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000

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DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100606	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100118	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100107	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100670	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100334	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000

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DRRT FBO MEAG MUNICH ERGO KAPITALANLAGEGESELLSCHAFT MBH	100717	4/16/2020	\$ -	Alexander Reus DRRT 340 West Flagler ST, Suite 201 Miami FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000